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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 31, 1986

Director, Waste Management Division
United States Environmental Protection
Agency, Region V
Attn: Hazardous Waste Enforcement Branch
230 South Dearborn Street
Chicago, Illinois 60604

President
Reilly Tar and Chemical
Corporation
1510 Market Square Center
151 North Delaware Street
Indianapolis, Indiana 46204

Director, Solid and Hazardous Waste Division
Minnesota Pollution Control Agency
Attn: Site Response Section
520 Lafayette Road
St. Paul, Minnesota 55155

RE: Soil Boring Plan Proposal
United States of America, et al. vs. Reilly Tar and
Chemical Corporation, et al.
File No. Civ. 4-80-469

Gentlemen:

On December 3, 1986, the City of St. Louis Park, Minnesota, submitted a proposal for installation of shallow borings and analysis of resulting soil cores for the purpose of determining the extent of subsurface contamination south of the former Reilly Tar and Chemical Corporation site. It has been brought to the City's attention that the submittal lacked two sections:

- Health and Safety Plan
- Community Relations Plan

Please find copies of the plans enclosed. We apologize for the oversight and hope their omission has not caused an inconvenience for those responsible for document review.

Sincerely,

James N. Grube

James N. Grube
Director of Public Works

JNG/ja
Enclosure

5005 minnetonka boulevard • st. louis park, minnesota 55416-2290 • phone (612) 924-2500

HEALTH &

SAFETY PLAN

for the

St. Louis Park Site
Soil Investigation

Located in

St. Louis Park, Minnesota

Project Number: Section 11.1 - 11.2 CD-RAP

Date: December 3, 1986

SITE DESCRIPTION

WORK SITE DESCRIPTION:

Soil borings and soil sampling for subsequent chemical analysis in an industrial/commercial area of the City of St. Louis Park.

Work will be completed in soils possibly contaminated with creosote related material.

COMPOUNDS OF CONCERN:

Coal tar and creosote. Species present may include phenols and Polynuclear Aromatic Hydrocarbons including, e.g. Benzo (a) Pyrene, Benz (a) Anthracene or Quinoline. These compounds are expected to be present at very low concentrations and not to pose any direct exposure hazard to the work team. If elevated levels of the compounds are detected, a direct exposure hazard to the work team or general public may exist.

PHYSICAL STATE OF COMPOUNDS:

Dissolved or suspended in ground water in trace quantities. Sorbed on soil particles in true quantities.

FACILITY DESCRIPTION:

The facility is an industrial/commercial area of a suburb. ~~No~~ Some residential areas are present. Several public roads cross the site. ~~Much~~ Some of the land (approximately 1/4) is undeveloped peat bog.

HISTORICAL INFORMATION:

Before a culvert and subsurface under Lake Street collapsed in 1933, and the surrounding area, the study area received surface drainage from a series of ponds and marshes to the north, which included some drainage from the Reilly Site. The extent of any contamination in this area has not been determined in previous studies. Further historical information is provided in the "Site Management Plan" section.

SCOPE OF WORK

PROPOSED DATE(S) OF FIELD ACTIVITY: To be determined.

PERSONNEL REQUIREMENTS:

NAME	RESPONSIBILITY
STS	Coordinate and perform soil borings/soil sampling

TRAINING REQUIREMENTS:

Respirator training and respirator fit test. Cold weather operations.

PROPOSED ON-SITE ACTIVITIES:

Soil borings at 15 to 25 locations south of the site (no activities within the Reilly Tar and Chemical Corporation site).

SCOPE OF WORK:

15 to 25 soil borings will be drilled, and at least 15 but no more than 45 soil samples will be retained for analysis.

HAZARD EVALUATION

OPERATIONAL HAZARDS:

Potential for extremely cold weather, if work is performed during winter months. Also, physical hazards associated with the operation of a drilling rig.

OVERALL HAZARD:

Anticipated LOW ⟷ Potential MEDIUM N/A HIGH

Overall hazard will be classified medium if contaminated water and subsoils are encountered during construction.

The existence of creosote compounds at sufficient concentrations may pose a direct exposure hazard to the work team or the general public. Exposure to coal tar and creosote has been known to produce phototoxic effects, resulting in skin irritation similar to sunburn.

The potential exists for exposure to hazardous substances that have been shown to cause cancer in laboratory animals during soil boring/sample retrieval.

PERSONAL PROTECTION REQUIREMENTS

RESPIRATORY PROTECTION REQUIREMENT: LEVEL D modified to Levels C or B as outlined below.

SPECIFICATIONS:

MSA Comfo II with Type GMC-H cartridges.

PROTECTIVE CLOTHING REQUIREMENT: LEVEL D (BASIC)

__X__ WORK CLOTHES/COVERALLS (long sleeved)

_____ CHEMICAL PROTECTIVE CLOTHING. TYPE? _____

_____

__X__ WORK SHOES (Steel Toe/Shank)

__X__ BOOTS. TYPE? Slush type

__X__ GLOVES. TYPE? Nitrile - for handling tools and equipment

__X__ HARD HAT

_____ FACE SHIELD

__X__ SAFETY GLASSES/GOGGLES

MODIFICATIONS:

Level D protection shall be upgraded to Level C protection if total organic vapors in the air are above background to 5 ppm, as determined using an HNU meter, and a situation immediately dangerous to life and health (IDLH) will not exist. Level B protection will be necessary if total organic vapors are between 5 to 500 ppm above background levels and if IDLH conditions may exist. Level C protection constitutes: safety shoes, gloves, boots, full body protective suit, full face respirator with particulate/acid gas/organic vapor cartridge, hard hat and safety shield. If noticeable odors or dust becomes objectionable, respirator protection should be used.

Hard hat/safety glasses required within 25 foot radius of operating drill rig.

MONITORING REQUIREMENTS:

1) INSTRUMENT: HNU PI-101

MONITORING PROCEDURE: Monitor breathing zone in accordance with manufacturer's instructions during soil boring operations.

2) INSTRUMENT: _____

MONITORING PROCEDURE: _____

_____

_____

PERSONAL DECONTAMINATION PROCEDURES

EQUIPMENT/SOLVENTS/SOLUTIONS: Alconox, clean water.

DECONTAMINATION PROCEDURE(S):

1) ITEM(S): Gloves, boots and other equipment as necessary.

PROCEDURE: Wash with alconox detergent and rinse with clean water.

DISPOSAL PROCEDURE: General refuse for all consumables (e.g., Tyvek coveralls)

SPECIAL INSTRUCTIONS: If visible creosote contaminated material is evident, all measures to prevent skin contact should be carried out. For example, tyvek suits, booties, gloves, and face shield, and hand tools should be decontaminated by soap and water at the end of each work day.

NOTE: The above specified decontamination procedures pertain to the decontamination of personal protective equipment only. Procedures for the decontamination of sampling tools and other related equipment should be specified in the subject work plan and/or QA plan.

EMERGENCY REFERENCE

AMBULANCE: 911

POLICE: 911

FIRE: 911

HOSPITAL: Methodist Hospital

Location: 6500 Excelsior Boulevard
St. Louis Park, Minnesota
932-5000

DIRECTIONS TO HOSPITAL:

South on Louisiana Avenue approximately .25 miles to Methodist Hospital.

A dry run by site Health and Safety personnel shall be conducted to Methodist Hospital from the general area of the soil boring locations.

POISON CONTROL CENTER: 347-3141

NATIONAL RESPONSE CENTER: 1-800-424-8802

CORPORATE:

Westwood Planning & Engineering Company - Richard Koppy	612-546-0155
ERT/Minneapolis, MN - William Gregg	612-541-1642
STS - James Overtoom	612-559-1900

AGENCY REPRESENTATIVE:

MPCA	Douglas J. Robohm	612-296-7288
EPA	Daniel J. Bicknell	312-886-7341

CLIENT REPRESENTATIVE:

James Grube	612-924-2551

NEAREST PHONE: Public phones in St. Louis Park

SECTION IV

COMMUNITY RELATIONS PLAN

COMMUNITY RELATIONS PLAN

The Soil Investigation is to be completed in accordance with the Consent Decree - Remedial Action Plan for the Reilly Tar and Chemical Corporation, St. Louis Park, Minnesota NPL Site. All community relations programs related to this work will be coordinated through the following agencies:

United States	- Ms. Judy Beck United States Environmental Protection Agency (312) 353-1325
State of Minnesota	- Ms. Susan Brustman Minnesota Pollution Control Agency (612) 296-7769
City of St. Louis Park	- Ms. Sharon Klumpp City of St. Louis Park (612) 924-2523

The City and Reilly Tar and Chemical Corporation agree to provide all necessary information to conduct the Community Relations Plan.